



Michael J. Proctor
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January 28, 2020

VIA ECF

The Honorable Paul G. Gardephe
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
Courtroom 705
New York, New York 10007

Re: *United States v. Michael Avenatti*
Case No. (S1) 19-CR-373 (PGG)

Your Honor:

I write on behalf of myself and Whitney R. O'Byrne, counsel for Non-Party and Subpoenaed Person Gary S. Franklin in the above-referenced matter, to respectfully request and move for permission to bring electronic devices to court during the upcoming trial. Mr. Franklin is on the Government's witness list and is expected to testify at some point during the trial. The devices, which are identified in the accompanying proposed order, will assist me and Ms. O'Byrne in our representation of Mr. Franklin. Further, the devices contain case materials and attorney work product that may be pertinent to the trial.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Michael J. Proctor".

Michael J. Proctor

cc: All Parties (by ECF)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

x

IN THE MATTER OF AN APPLICATION
TO BRING PERSONAL ELECTRONIC DEVICE(S)
OR GENERAL PURPOSE COMPUTING DEVICE(S)
INTO THE COURTHOUSES OF THE
SOUTHERN DISTRICT OF NEW YORK
FOR USE IN A PROCEEDING OR TRIAL

x

The following Order is subject to the definitions, obligations and restrictions imposed pursuant to Standing Order M10-468, as Revised. Upon submission of written application to this Court, it is hereby

ORDERED that the following attorney(s) are authorized to bring the Personal Electronic Device(s) and/or the General Purpose Computing Device(s) (collectively, "Devices") listed below into the Courthouse for use in a proceeding or trial in the action captioned United States v. Michael Avenatti

_____, No. (S1) 19-CR-373 (PGG).

The date(s) for which such authorization is provided is (are) January 30, 2020 to February 10, 2020.

Attorney	Device(s)
1. Michael J. Proctor	1 Personal Device (iPhone) and 1 Personal Laptop
2. Whitney R. O'Byrne	1 Personal Device (iPhone) and 1 Personal Laptop
3.	

(Attach Extra Sheet If Needed)

The attorney(s) identified in this Order must present a copy of this Order when entering the Courthouse. Bringing any authorized Device(s) into the Courthouse or its Environs constitutes a certification by the attorney that he or she will comply in all respects with the restrictions and obligations set forth in Standing Order M10-468, as Revised.

SO ORDERED:

Dated: _____

United States Judge